

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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SANDRA GUZMAN,	:	
	:	
Plaintiff,	:	No. 09 Civ. 9323 (BSJ)(RLE)
	:	
v.	:	
	:	
NEWS CORPORATION, NYP HOLDINGS,	:	
INC., d/b/a THE NEW YORK POST, and COL	:	
ALLAN, in his official and individual capacities,	:	
	:	
Defendants.	:	
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DECLARATION OF KENNETH P. THOMPSON

I, KENNETH P. THOMPSON, declare under penalty of perjury the following:

1. I am a partner in the law firm Thompson Wigdor LLP, attorneys for Plaintiff Sandra Guzman (“Plaintiff”), and as such, I am fully familiar with the matters set forth herein.
2. Attached hereto as Exhibit A is a true and correct copy of the Amended Complaint in this action.
3. Attached hereto as Exhibit B is a true and correct copy of relevant portions of the transcript of Plaintiff’s deposition.
4. Attached hereto as Exhibit C is a true and correct copy of relevant portions of the transcript of Defendant Col Allan’s deposition.
5. Attached hereto as Exhibit D is a true and correct copy of relevant portions of the transcript of Jesse Angelo’s deposition.
6. Attached hereto as Exhibit E is a true and correct copy of the Affidavit of Leonard Greene.

7. Attached hereto as Exhibit F is a true and correct copy of pages 11 and 12 of the February 18, 2009 edition The New York Post.

8. Attached hereto as Exhibit G is a true and correct copy of Defendants' Memorandum of Law in Support of Motion to Dismiss the Complaint, dated December 30, 2009.

9. Attached hereto as Exhibit H is a true and correct copy of this Court's September 27, 2010 decision denying Defendants' motion to dismiss.

10. Attached hereto as Exhibit I is a true and correct copy of Defendants' Memorandum of Law in Support of Motion to Strike Certain Allegations, dated October 27, 2010.

11. Attached hereto as Exhibit J is a true and correct copy of the Order of Magistrate Judge Ellis, dated April 26, 2011.

12. Attached hereto as Exhibit K is a true and correct copy of Defendants' Memorandum of Law in Support of Defendants' Motion for Protective Order, dated April 27, 2012.

13. Attached hereto as Exhibit L is a true and correct copy of Defendants' Reply Memorandum of Law in Further Support of Defendants' Motion for a Protective Order, dated May 14, 2012.

14. Attached hereto as Exhibit M is a true and correct copy of relevant portions of the transcript of the May 31, 2012 status conference before Judge Ellis.

15. Attached hereto as Exhibit N is a true and correct copy of the June 29, 2012 Memorandum and Order of Judge Ellis denying Defendants' Motion for Protective Order.

Dated: July 27, 2012
New York, New York

Respectfully submitted,

A handwritten signature in black ink, appearing to read "K. Thompson", written over a horizontal line.

Kenneth P. Thompson